

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	
	§	CHAPTER 11
ALEXANDER E. JONES	§	
	§	CASE NO. 22-33553 (CML)
DEBTOR.	§	

**DECLARATION IN SUPPORT OF BANK OF AMERICA, N.A.'S MOTION TO
PARTIALLY QUASH THE NOTICE OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS' BANKRUPTCY RULE 2004 EXAMINATION OF BANK
OF AMERICA, N.A.**

My name is Angela Dashnaw. I am over 18 years of age, of sound mind, competent to make this declaration, and have personal knowledge of the information set forth herein.

I am employed by Bank of America, N.A. as an Officer, Operations Team Lead. Through my employment and by virtue of my role and responsibilities, I have personal knowledge of the matters stated herein.

I have reviewed the Notice of the Official Committee of Unsecured Creditors' Bankruptcy Rule 2004 Examination of Bank of America, including subpart (h) of request for production no. 3. That request seeks any "Know Your Customer" documentation concerning certain accounts associated with the Debtor.

Generally, Know Your Customer documentation encompasses the policies, procedures, and processes that Bank of America implements to comply with applicable law and regulations, including the Bank Secrecy Act. Those regulations dictate, among other things, what a financial institution must do to verify customer identities and the monitoring financial institutions must perform to identify and report suspicious transactions.

Through my employment and by virtue of my role and responsibilities, I am familiar with Bank of America's Know Your Customer documentation.

Bank of America's Know Your Customer documentation reflects Bank of America's proprietary and private internal policies, procedures, and processes for complying with laws generally applicable to similar institutions, including laws and regulations included in and issued under the authority of the Bank Secrecy Act. Those policies, procedures, and processes are not known outside of Bank of America, and Bank of America maintains strict controls to protect them from unauthorized disclosure outside of the organization. Nor is that information generally known by all Bank of America employees or personnel. Only Bank of America personnel involved in complying with Bank of America's Know Your Customer obligations have access to that information.

Bank of America takes affirmative measures to safeguard its Know Your Customer documentation, including implementing firewalls, data security and information-sharing protocols, and internal policies and procedures designed to prevent inadvertent or external disclosure.

Bank of America's Know Your Customer documentation would be valuable to Bank of America's competitors and criminal elements. Particularly, disclosure of this proprietary information would irreparably harm Bank of America because it would provide competitors with an advantage in predicting Bank of America's internal operations strategies and business decision-making, while disclosing to criminal elements the very security measures intended to stop them.

Bank of America has gone to considerable effort and expense over numerous years to develop, create, and maintain its Know Your Customer documentation.

It would be difficult if not impossible for others to acquire or duplicate Bank of America's Know Your Customer documentation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 26, 2023.

Declarant